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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
Plaintiff,)	
)	REVISED JOINT PROPOSED VERDICT
vs.)	FORM
)	
CHEVRON U.S.A. INC., a California)	
Corporation, and DOES 1 through 10,)	District Judge: Hon. Hernan D. Vera
inclusive,)	Magistrate Judge: Hon. A. Joel Richlin
)	Action Filed: August 3, 2023
Defendants.)	Pre-Trial Conf.: July 29, 2025
)	Trial Date: August 19, 2025
)	
)	

Pursuant to the Court's Civil Trial Order, Plaintiff, Mark Snookal and Defendant Chevron U.S.A. Inc. through their respective counsel hereby file this Revised Joint Proposed Verdict Form.

Dated: August 8, 2025

ALLRED, MAROKO & GOLDBERG

By /s/ Dolores Leal

DOLORES LEAL
OLIVIA FLECHSIG

Attorneys for Plaintiff
MARK SNOOKAL

Dated: August 8, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Tracey A. Kennedy

TRACEY A. KENNEDY
ROBERT E. MUSSIG
H. SARAH FAN

Attorneys for Defendant
CHEVRON U.S.A. INC.,
a Pennsylvania Corporation

We, the jury, answer the questions submitted to us as follows:

1. Was Chevron U.S.A. Inc. aware that Mark Snookal had a disability?

_____ Yes _____ No

If your answer to question 1 is “Yes”, then answer question 2.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Was Mark Snookal able to perform the essential job duties of the Reliability Engineering Manager position in Escravos, Nigeria with or without accommodation?

_____ Yes _____ No

If your answer to question 2 is “Yes”, then answer question 3.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Chevron U.S.A. Inc. rescind the Reliability Engineering Manager position in Escravos, Nigeria from Mark Snookal?

_____ Yes _____ No

If your answer to question 3 is “Yes”, then answer question 4.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Mark Snookal’s disability a substantial motivating reason for Chevron USA, Inc’s decision to rescind the job offer for the Reliability Engineering Manager position in Escravos, Nigeria?

_____ Yes _____ No

If your answer to question 4 is “Yes”, then answer question 5.

If you answered “No”, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Chevron USA's Inc's recission of the Reliability Engineering Manager position in Escravos, Nigeria a substantial factor in causing harm to Mark Snookal?

____ Yes ____ No

If your answer to question 5 is "Yes", then answer question 6.

If you answered "No," stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Did Mark Snookal's disability pose a direct threat to his health and safety or the health and safety of others?

____ Yes ____ No

If your answer to question 6 is "Yes", stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered "No," then answer question 7.

7. What are Mark Snookal's damages?

a. Past economic loss: \$ _____

b. Future economic loss: \$ _____

c. Past noneconomic loss, including physical pain/mental suffering:

\$ _____

d. Future noneconomic loss, including physical pain/mental suffering:

\$ _____

TOTAL \$ _____

8. Should Mark Snookal receive prejudgment interest on the past economic damages?¹

____ Yes ____ No

[continued]

¹ This question is disputed by Defendant Chevron U.S.A. Inc.

1 **Signed: Presiding Juror** _____

2 **Dated:** _____

3 **After this verdict form has been signed, notify the clerk.**

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Attestation of Concurrence of Filing

The ECF filer, Dolores Y. Leal, Esq., attests that all other signatories listed, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.